

MEMO

(External Correspondence)



To: Board of Managers
BRRWD

Date: September 11, 2017

Cc: File HEI Project No. 1915-189

From: Erik Jones, P.E.

Subject: Wolverton Creek
Water Management District
Charge Determination Modifications
HEI Project No. 1915-189

Introduction

The Buffalo-Red River Watershed District held a project hearing for the Wolverton Creek Restoration and Sediment Reduction project on August 15, 2017 at their office in Barnesville. One of the purposes of that hearing was to present the Water Management District (WMD) proposed as a mechanism for project funding and to also receive comments in regard to the proposed fees. A number of comments were received and, where appropriate, adjustments have been made to the WMD.

The provisions for the collection of charges under MS 103D.729 gives a Watershed District, through the amendment of its plan or during an update to the Watershed Management Plan (WMP), the authority to establish one or more Water Management Districts (WMD) for the purpose of collecting revenues and paying the costs of projects initiated under sections 103B.231, 103D.601, 103D.605, 103D.611, or 103D.730. The establishment of a WMD requires the description of the methods used to determine the charges. These methods were generally described within the revised WMP adopted by the Board of Managers on June 9, 2010. The methods for the proposed Wolverton Creek Water Management District (Wolverton Creek) were described in detail and the charges determined using these methods in a memo to the BRRWD Board of Managers dated February 13, 2017. This memo describes the changes to the previously determined fee structure.

The Project

The current project for which a WMD is being considered is the Wolverton Creek Restoration and Sediment Reduction project. The project involves 20 miles of Wolverton Creek channel restoration which would result in the construction of a two-stage channel with expanded vegetative buffers along the length of the stream. The Project also includes project features installed previously along Wolverton Creek downstream of Highway 75 including a series of rock riffles for grade control, side inlets for sediment control coming into the channel, and stream barbs to control channel bank erosion. The BRRWD has received a permit from the Minnesota Department of Natural Resources (DNR) and the US Army Corps of Engineers (USACOE) for this work. Conditions of the DNR permit for the work require the installation of erosion control in the form of grade control, bufferstrips, and side inlet sediment controls on tributary ditch systems, expansion of the buffers along the Wolverton Creek and the installation of sediment best management practices (BMPs) along the waterway as well. Sediment BMPs would likely involve installation of side inlets along the creek. The DNR permit was granted based on the proposed concept plan for the Wolverton Creek watershed dated 2013.

Comments from the August 15, 2017 Hearing and Responses to comments

A number of comments were received and some were marked up on maps at the August 15, 2017 hearing. Some involved ensuring that farmsteads were correctly identified and charged appropriately. The ones noted were:

SW corner, Sec. 15, Holy Cross Township – Mark Askegaard
Center, Section 15, Holy Cross Township – Robert Askegaard
SW corner, Section 4, Deerhorn Township, Paul Paschke
NW corner, NE1/4, Section 9, Deerhorn Township, Donald Bohner,

When the development of the WMD charge determination was initially started in 2016, preliminary review of the 2011 National Landuse Coverage Dataset (NLCD) showed several discrepancies with actual landuse data based on more recent aerial photography. Recognizing that the methods (infrared) to develop the landuse data has limitations that can result in an incorrect landuse, HEI corrected the landuse coverage based on the most recent aerial photography. Based on comments received at the hearing, HEI went back and reviewed the landuse map and the most recent aerial photography was reviewed for consistency with the land use data used in the WMD calculations. No inconsistencies were found and the calculated charges are correct. No changes are necessary for these parcels. A copy of the landuse map is shown in **Figure 1**.

Another comment was related to the drainage boundary in SW1/4, Section 1 of Holy Cross Township. A dry approach to the east of the farmstead driveway was identified. A total of 3.4 acres of drainage was eliminated from the WMD as a result that this water cannot flow to Wolverton Creek. The remainder of the drainage area to the east of this driveway is drained north and west to a point near the west quarter corner and then south along the road.

A third comment received related to drainage out of the northwest corner of Section 19 of Alliance Township. A flow split occurs in this location with some water leaving Clay County Ditch No. 53 (a Wolverton Creek Tributary), and entering the Sabin Coulee. Water entering the Sabin Coulee flows north and bypasses the Wolverton Creek and enters the Red River directly through Clay County Ditches Nos. 11 North and 40. A review of the flow split conditions show that approximately 10 percent of the flow goes north out of the County Ditch No. 53 system and into the Sabin Coulee during the 10-year flood event. The restoration work along the Wolverton Creek is based on a 10-year protection design. Based on the flow split, we adjusted the 698.5 acres of drainage coming to the northwest corner of Section 19. Water flowing north along the west side of Section 19 in County Ditch No. 53 does not get to the flow split until events in excess of the 10-year flood event.

A fourth comment was received concerning drainage in the W1/2 of the SW1/4 of Section 15 of Roberts Township. A closer review of this area along the Nyquist Coulee was completed and the land in this parcel was eliminated from the WMD.

A comment on drainage from the NW1/4, Section 34, Wolverton Township was received and reviewed. It appears that the landuse and drainage divides were correctly identified in the previous WMD calculations. No changes to WMD charges were made.

A comment on drainage from Section 36 Deerhorn Township was received. Section 36 is not in the benefit area of Wilkin County Ditch No. 22 and was eliminated from the WMD.

A comment was received regarding drainage out of the E1/2, Section 19, Mitchell Township. A review of the LIDAR was completed. All property in the SE1/4 was eliminated from the WMD.

A comment regarding drainage from and through Section 13, Roberts Township was regarding missing some land there. The comment indicated that there's a waterway in Sections 13 and 24, with a culvert in 190th Street that allows water from Section 24 to drain north into Wolverton Creek. They also mentioned CRP lands in the NE1/4, Sec. 13, and wondered if that was taken into account with the fees. From a review topography maps/aerials, there is a ridge in the SE1/4 of Section 13 that does not allow land to the south to flow north so no land in Section 24 will be included in the WMD. The previously determined drainage divide appears to be correct. The CRP lands in the NE1/4, Sec. 13 were identified as natural area so calculated WMD fees are correct. No changes required.

Figure 2 shows all changes made based on the comments and responses listed above.

The Water Management District Process

With the changes as noted above made, the Water Management District now includes over 66,360 acres and raises a fee of \$99,407.35. The updated Water Management District is tabulated in the attached tables. The fee for each

individual parcel can be found in these tables. **Figure 3** shows the Water Management District and associated fee range on a parcel basis.

The Water Management District Process

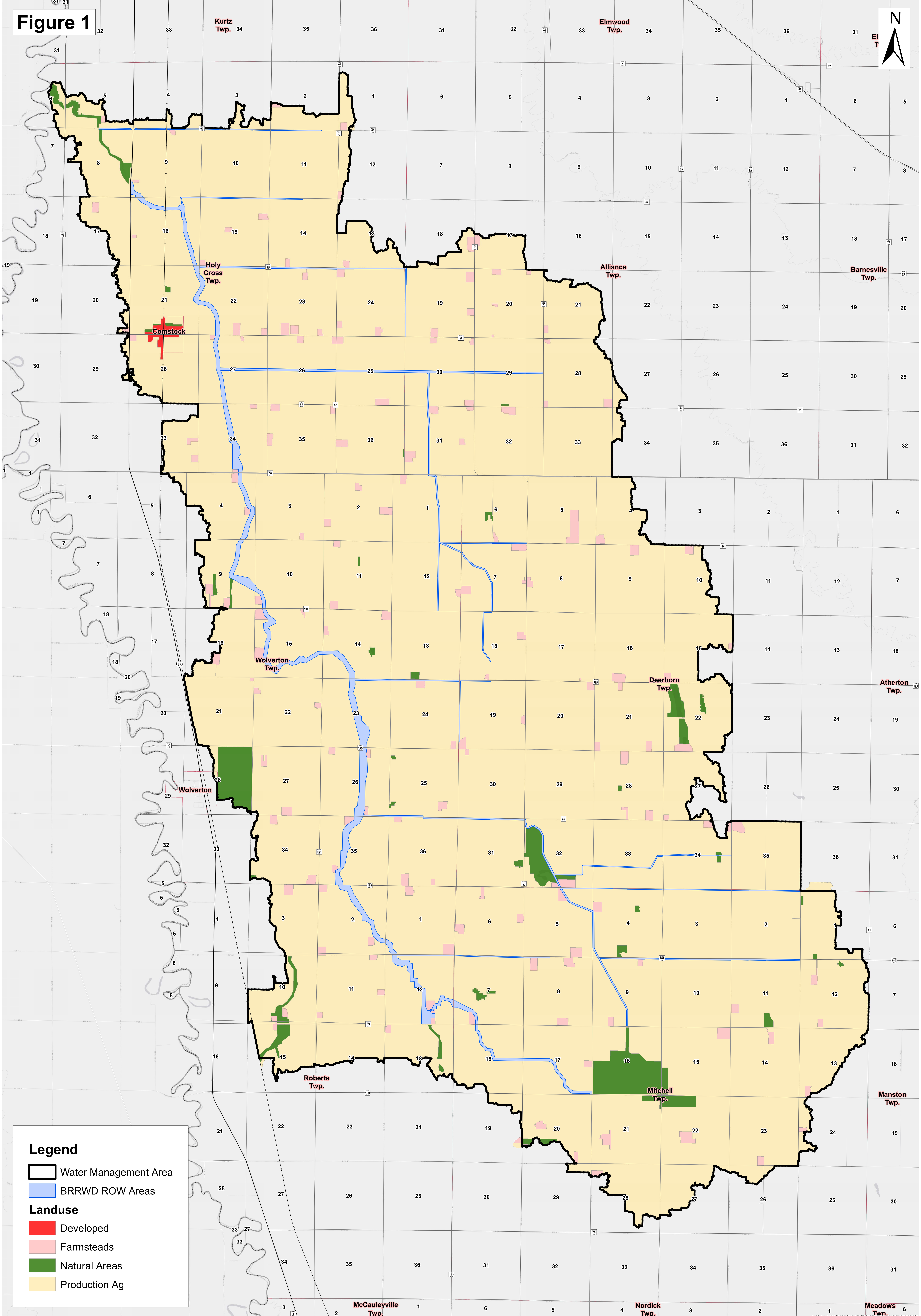
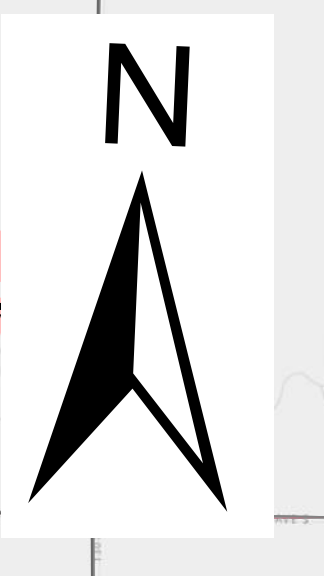
The BWSR has provided draft guidance as to the process of creating a WMD. The process involves eight steps. The first two steps are addressed through the revision of the Watershed Management Plan. At this point, the BRRWD Board of Managers is midway through step 6 in this process.

- Step 1.** Amend Watershed District Plan to create a water management district.
Amendment must include:
- Description of area to be in the water management district
 - The amount to be raised by charges (total amount is necessary if fixed time for water management district to be in force, otherwise annual maximum (cap) amount)
 - The method that will be used to determine the charges
 - The length of time the water management district will be in force (perpetuity is acceptable)
- Step 2.** Approval of Plan amendment under M.S. § 103D.411 or as part of a revised Plan under M.S. § 103D.405.
- Revised Plan, or petition and amendment, sent to BWSR
 - BWSR gives legal notice, and holds hearing if requested
 - BWSR orders approval or prescribes plan or amendment
 - BWSR notifies WD managers, counties, cities, SWCDs
- Step 3.** Watershed District refines methodology for computing charges.
- Step 4.** Watershed District determines and sets charges for all properties within the water management district after identifying scope of project and deciding method(s) of funding project.
- Step 5.** Watershed District develops collection mechanism.
- Request County or Counties to collect, or Billing and collection by Watershed District
- Step 6.** Watershed District holds hearing, orders the establishment (implementation) of a project in the water management district, and initiates stormwater utility charges.
- Projects implemented must be ordered by the managers
 - Order for project must specify funding method(s)
 - Watershed District must notify counties, cities, and towns within the affected area at least 10 days prior to a hearing or decision on projects implemented under this section of statute
- Step 7.** Watershed District establishes a separate fund for proceeds collected from the stormwater utility charges.
- Step 8.** Resolution of Disputes. Local governments may request BWSR to resolve disputes pursuant to M.S. § 103B.101, Subd. 10.

Next Steps and Recommendations

The recommended charge for the Western Planning Region is the modified combined method as described in the February 13, 2017 memo to the Board of Managers. We also recommend that the Board adopt the proposed charge changes as described in this memo and as tabulated in the attached tables.

Figure 1



Legend

- Water Management Area
- BRRWD ROW Areas

Landuse

- Developed
- Farmsteads
- Natural Areas
- Production Ag

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Figure 2

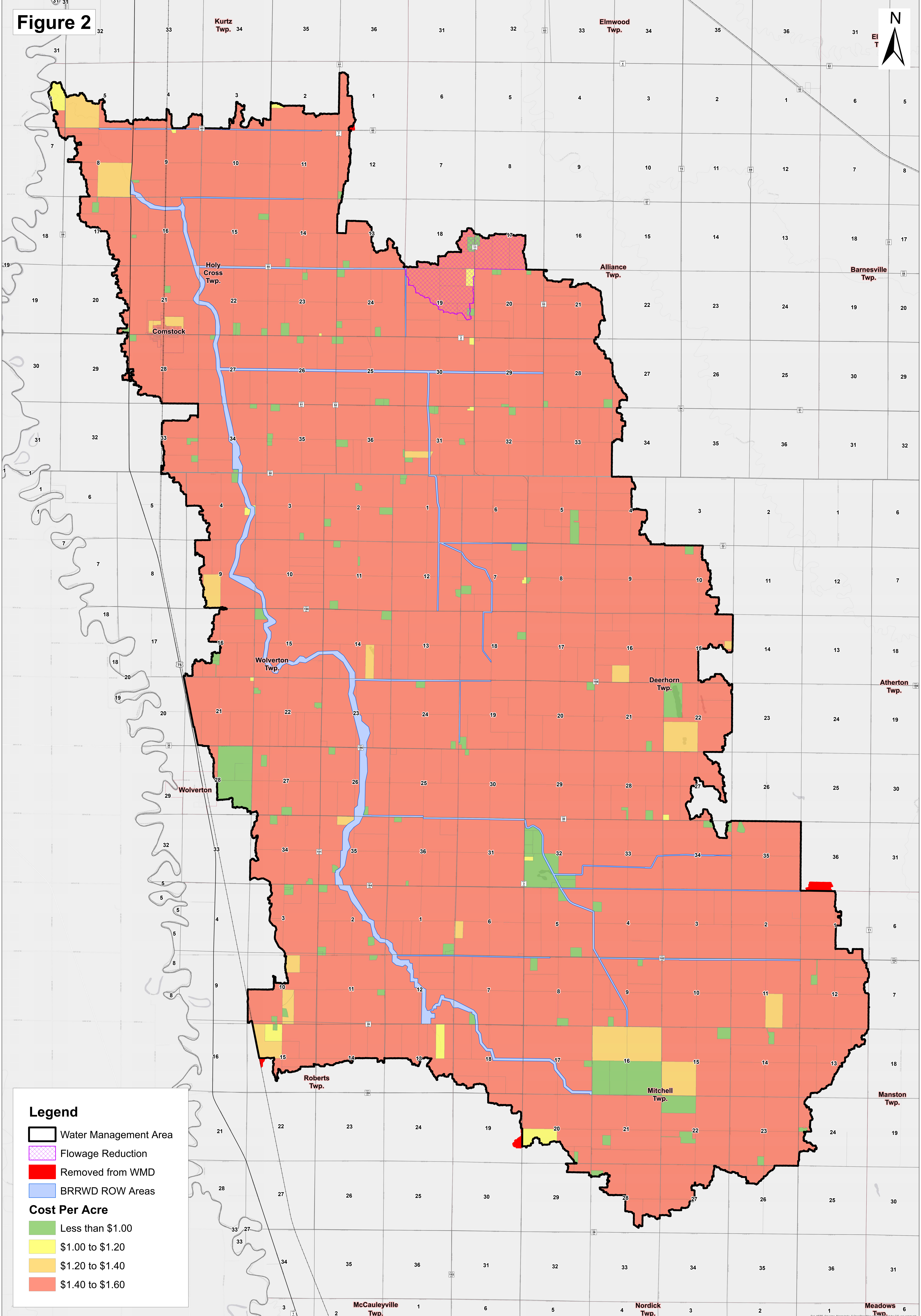
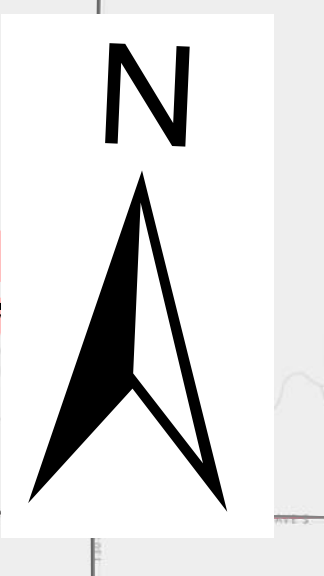
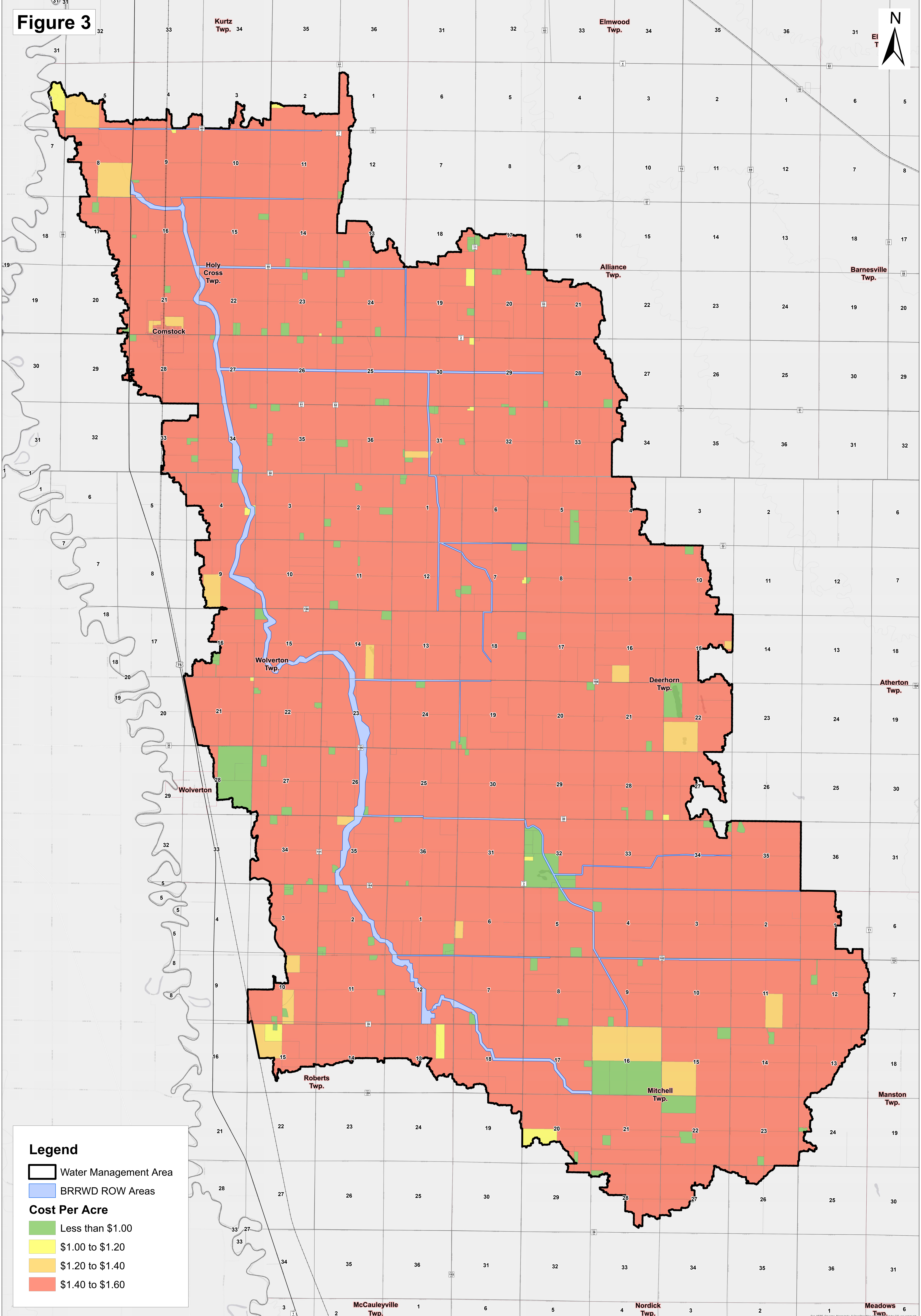
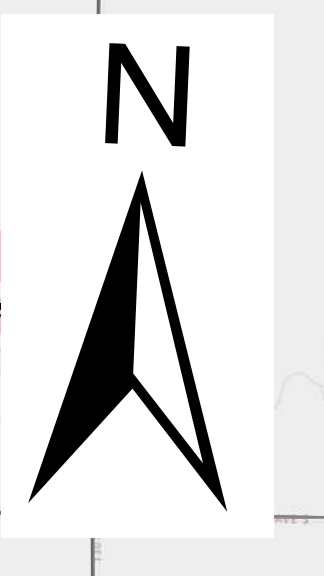


Figure 3



Legend

- Water Management Area
- BRRWD ROW Areas

Cost Per Acre

- Less than \$1.00
- \$1.00 to \$1.20
- \$1.20 to \$1.40
- \$1.40 to \$1.60

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Exhibit A - Clay County

| Parcel | Landowner Name | Landowner Address | Section | Township | Range | Legal Description | GIS Acres | Impacted Acres | Total Annual Charges |
|-------------|------------------------------------------|-------------------------|---------|----------|-------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------|----------------|----------------------|
| 51.010.0130 | GRAFF LANCE & LOIS | 15853 18TH ST S | 21 | | | SubdivisionName ASKEGAARDS 1ST ADD Lot 012 Block 002 SubdivisionCd 51010 | 0.2 | 0.18 | \$ 0.26 |
| 51.010.0140 | HERMANN PHILLIP & S CHRISTENSE | 1756 159TH AVE S | 21 | | | SubdivisionName ASKEGAARDS 1ST ADD Lot 012 Block 002 SubdivisionCd 51010 | 0.1 | 0.14 | \$ 0.20 |
| 51.010.0150 | JOHNSON RONALD J | 1746 159TH AVE S | 21 | 137 | 48 | SubdivisionName ASKEGAARDS 1ST ADD Lot 015 Block 002 SubdivisionCd 51010 | 0.2 | 0.16 | \$ 0.23 |
| 51.010.0160 | JOHNSON RONALD J | 1746 159TH AVE S | 21 | 137 | 48 | SubdivisionName ASKEGAARDS 1ST ADD Lot 017 Block 002 SubdivisionCd 51010 | 0.2 | 0.16 | \$ 0.23 |
| 51.010.0170 | ROSWICK RICHARD | 1509 5TH AVE S | 21 | 137 | 48 | SubdivisionName ASKEGAARDS 1ST ADD Lot 019 Block 002 SubdivisionCd 51010 | 0.2 | 0.16 | \$ 0.23 |
| 51.010.0180 | ROSWICK RICHARD | 1509 5TH AVE S | 21 | 137 | 48 | SubdivisionName ASKEGAARDS 1ST ADD Lot 021 Block 002 SubdivisionCd 51010 | 0.2 | 0.16 | \$ 0.23 |
| 51.010.0190 | TAASAAS MYRON H | 1711 160TH AVE S | 28 | 137 | 48 | SubdivisionName ASKEGAARDS 1ST ADD Lot 001 Block 003 SubdivisionCd 51010 | 0.2 | 0.20 | \$ 0.28 |
| 51.010.0200 | BURNSIDE JERRY R | PO BOX 36 | 28 | 137 | 48 | SubdivisionName ASKEGAARDS 1ST ADD Lot 003 Block 003 SubdivisionCd 51010 | 0.3 | 0.32 | \$ 0.45 |
| 51.010.0205 | DMT PROPERTIES | PO BOX 249 | 28 | 137 | 48 | SubdivisionName ASKEGAARDS 1ST ADD Lot 007 Block 003 SubdivisionCd 51010 | 0.2 | 0.21 | \$ 0.29 |
| 51.010.0220 | DMT PROPERTIES | PO BOX 249 | 28 | 137 | 48 | SubdivisionName ASKEGAARDS 1ST ADD Lot 009 Block 003 SubdivisionCd 51010 | 0.2 | 0.18 | \$ 0.26 |
| 51.010.0230 | TONSFELDT DEAN & MAE | PO BOX 249 | 28 | 137 | 48 | SubdivisionName ASKEGAARDS 1ST ADD Lot 011 Block 003 SubdivisionCd 51010 | 0.0 | 0.05 | \$ 0.06 |
| 51.015.0010 | BRANDT HAROLD G & ARDELLE | 4503 3RD ST S | 28 | 137 | 48 | SubdivisionName ASKEGAARDS 2ND ADD Lot 001 Block 001 SubdivisionCd 51015 | 0.3 | 0.33 | \$ 0.47 |
| 51.015.0020 | BRANDT HAROLD G & ARDELLE | 4503 3RD ST S | 28 | 137 | 48 | SubdivisionName ASKEGAARDS 2ND ADD Lot 002 Block 001 SubdivisionCd 51015 | 0.3 | 0.30 | \$ 0.48 |
| 51.015.0030 | BRANDT HAROLD G & ARDELLE | 4503 3RD ST S | 28 | 137 | 48 | SubdivisionName ASKEGAARDS 2ND ADD Lot 003 Block 001 SubdivisionCd 51015 | 0.3 | 0.32 | \$ 0.50 |
| 51.015.0040 | BRANDT HAROLD G & ARDELLE | 4503 3RD ST S | 28 | 137 | 48 | SubdivisionName ASKEGAARDS 2ND ADD Lot 004 Block 001 SubdivisionCd 51015 | 0.4 | 0.35 | \$ 0.55 |
| 51.015.0050 | BRANDT HAROLD G & ARDELLE | 4503 3RD ST S | 28 | 137 | 48 | SubdivisionName ASKEGAARDS 2ND ADD Lot 005 Block 001 SubdivisionCd 51015 | 0.4 | 0.40 | \$ 0.61 |
| 51.015.0060 | AZIZ RIAZ A & MARY D | PO BOX 113 | 28 | 137 | 48 | SubdivisionName ASKEGAARDS 2ND ADD Lot 006 Block 001 SubdivisionCd 51015 | 1.5 | 1.49 | \$ 2.10 |
| 51.015.0070 | GATE CITY BANK | 500 2ND AVE N | 28 | 137 | 48 | SubdivisionName ASKEGAARDS 2ND ADD Lot 007 Block 001 SubdivisionCd 51015 | 0.3 | 0.26 | \$ 0.36 |
| 51.015.0080 | C-W VALLEY COOP & C/O CURT BJERTNESS | PO BOX 69 | 28 | 137 | 48 | SubdivisionName ASKEGAARDS 2ND ADD Lot 001 Block 002 SubdivisionCd 51015 | 3.4 | 3.43 | \$ 4.82 |
| 51.015.0100 | ASKEGAARD EDWIN D | 2203 VICTORIA ROSE LN S | 28 | 137 | 48 | SubdivisionName ASKEGAARDS 2ND ADD Lot 003 Block 002 SubdivisionCd 51015 | 0.3 | 0.30 | \$ 0.47 |
| 51.015.0110 | ASKEGAARD EDWIN D | 2203 VICTORIA ROSE LN S | 28 | 137 | 48 | SubdivisionName ASKEGAARDS 2ND ADD Lot 004 Block 002 SubdivisionCd 51015 | 0.4 | 0.35 | \$ 0.56 |
| 51.015.0120 | ASKEGAARD EDWIN D | 2203 VICTORIA ROSE LN S | 28 | 137 | 48 | SubdivisionName ASKEGAARDS 2ND ADD Lot 005 Block 002 SubdivisionCd 51015 | 0.4 | 0.40 | \$ 0.62 |
| 51.500.0010 | TRUJILLO MICHAEL & ASHLEY | 15853 20TH ST S | 21 | 137 | 48 | SubdivisionName ORIGINAL COMSTOCK Lot 001 Block 003 SubdivisionCd 51500 | 0.3 | 0.28 | \$ 0.39 |
| 51.500.0020 | ERICKSON RICK | PO BOX 14 | 21 | 137 | 48 | SubdivisionName ORIGINAL COMSTOCK Lot 002 Block 003 SubdivisionCd 51500 | 0.3 | 0.28 | \$ 0.39 |
| 51.500.0030 | ERICKSON RICK | PO BOX 14 | 21 | 137 | 48 | SubdivisionName ORIGINAL COMSTOCK Lot 003 Block 003 SubdivisionCd 51500 | 0.3 | 0.28 | \$ 0.39 |
| 51.500.0040 | SHELLITO KATHLEEN | PO BOX 35 | 21 | 137 | 48 | SubdivisionName ORIGINAL COMSTOCK Lot 004 Block 003 SubdivisionCd 51500 | 0.3 | 0.28 | \$ 0.39 |
| 51.500.0050 | SHELLITO KATHLEEN | PO BOX 35 | 21 | 137 | 48 | SubdivisionName ORIGINAL COMSTOCK Lot 005 Block 003 SubdivisionCd 51500 | 0.6 | 0.56 | \$ 0.78 |
| 51.500.0060 | COMSTOCK EVANGELICAL LUTHERAN | PO BOX 7 | 21 | 137 | 48 | SubdivisionName ORIGINAL COMSTOCK Lot 001 Block 004 SubdivisionCd 51500 | 1.7 | 1.67 | \$ 2.34 |
| 51.500.0100 | HENDRICKSON KENNETH L . | 2047 159TH AVE S | 21 | 137 | 48 | SubdivisionName ORIGINAL COMSTOCK Lot 001 Block 005 SubdivisionCd 51500 | 0.4 | 0.38 | \$ 0.53 |
| 51.500.0110 | VON BANK MARYANNE | PO BOX 95 | 21 | 137 | 48 | SubdivisionName ORIGINAL COMSTOCK Lot 005 Block 005 SubdivisionCd 51500 | 0.3 | 0.34 | \$ 0.48 |
| 51.500.0120 | BOATMAN GARY R | 714 8TH ST S | 21 | 137 | 48 | SubdivisionName ORIGINAL COMSTOCK Lot 010 Block 005 SubdivisionCd 51500 | 0.2 | 0.24 | \$ 0.34 |
| 51.500.0130 | TROWBRIDGE HUGH J | PO BOX 34 | 21 | 137 | 48 | SubdivisionName ORIGINAL COMSTOCK Lot 013 Block 005 SubdivisionCd 51500 | 0.2 | 0.24 | \$ 0.34 |
| 51.500.0140 | TROWBRIDGE HUGH J | PO BOX 34 | 21 | 137 | 48 | SubdivisionName ORIGINAL COMSTOCK Lot 016 Block 005 SubdivisionCd 51500 | 0.1 | 0.08 | \$ 0.11 |
| 51.500.0150 | AXTMAN SARAH L | 2028 160TH AVE S | 21 | 137 | 48 | SubdivisionName ORIGINAL COMSTOCK Lot 017 Block 005 SubdivisionCd 51500 | 0.2 | 0.24 | \$ 0.34 |
| 51.500.0160 | KOTTA ARLEN R | PO BOX 114 | 21 | 137 | 48 | SubdivisionName ORIGINAL COMSTOCK Lot 020 Block 005 SubdivisionCd 51500 | 0.2 | 0.19 | \$ 0.27 |
| 51.500.0170 | EISINGER DARIN & JODELL | 2062 160TH AVE S | 21 | 137 | 48 | SubdivisionName ORIGINAL COMSTOCK Lot 022 Block 005 SubdivisionCd 51500 | 0.2 | 0.21 | \$ 0.29 |
| 51.500.0180 | LOUGHEED WAYNE & CASSANDRA | 3014 33 ST S | 21 | 137 | 48 | SubdivisionName ORIGINAL COMSTOCK Lot 001 Block 006 SubdivisionCd 51500 | 0.3 | 0.32 | \$ 0.45 |
| 51.500.0190 | CARLSON JEFFREY D | PO BOX 123 | 21 | 137 | 48 | SubdivisionName ORIGINAL COMSTOCK Lot 005 Block 006 SubdivisionCd 51500 | 0.3 | 0.32 | \$ 0.45 |
| 51.500.0200 | ERICKSON KAY L | 15924 19TH ST S | 21 | 137 | 48 | SubdivisionName ORIGINAL COMSTOCK Lot 009 Block 006 SubdivisionCd 51500 | 0.3 | 0.32 | \$ 0.45 |
| 51.500.0210 | TONSFELDT DEAN & MAE | 646 EVERGREEN CIR | 21 | 137 | 48 | SubdivisionName ORIGINAL COMSTOCK Lot 013 Block 006 SubdivisionCd 51500 | 0.2 | 0.24 | \$ 0.34 |
| 51.500.0220 | TONSFELDT DEAN & MAE | 646 EVERGREEN CIR | 21 | 137 | 48 | SubdivisionName ORIGINAL COMSTOCK Lot 016 Block 006 SubdivisionCd 51500 | 0.1 | 0.08 | \$ 0.11 |
| 51.500.0230 | GUEST PAMELA EVON | PO BOX 83 | 21 | 137 | 48 | SubdivisionName ORIGINAL COMSTOCK Lot 017 Block 006 SubdivisionCd 51500 | 0.2 | 0.16 | \$ 0.23 |
| 51.500.0240 | GUEST PAMELA EVON | PO BOX 83 | 21 | 137 | 48 | SubdivisionName ORIGINAL COMSTOCK Lot 019 Block 006 SubdivisionCd 51500 | 0.2 | 0.16 | \$ 0.23 |
| 51.500.0250 | CHRISTIANSON ROGER & DENISE | 1958 160TH AVE S | 21 | 137 | 48 | SubdivisionName ORIGINAL COMSTOCK Lot 021 Block 006 SubdivisionCd 51500 | 0.3 | 0.32 | \$ 0.45 |
| 51.900.0001 | HOLY CROSS TOWN OF & C/O MARK T ANDERSON | 4495 160TH AVE S | 21 | 137 | 48 | SubdivisionName AUDITORS OUTLOTS TO COMSTOCK Lot 00A SubdivisionCd 51900 | 3.8 | 3.78 | \$ 5.31 |
| 51.900.0002 | CRUDEN JOHN | PO BOX 507 | 21 | 137 | 48 | SubdivisionName AUDITORS OUTLOTS TO COMSTOCK Lot 0EE SubdivisionCd 51900 | 0.5 | 0.48 | \$ 0.68 |
| 51.900.0010 | COMSTOCK CITY OF | PO BOX 39 | 21 | 137 | 48 | SubdivisionName AUDITORS OUTLOTS TO COMSTOCK Lot 00B SubdivisionCd 51900 | 0.7 | 0.72 | \$ 1.01 |
| 51.900.0020 | COMSTOCK CITY OF | PO BOX 39 | 21 | 137 | 48 | SubdivisionName AUDITORS OUTLOTS TO COMSTOCK Lot 00D SubdivisionCd 51900 | 1.0 | 1.00 | \$ 1.57 |
| 51.900.0030 | O'BRIEN DENNIS & TAYRA | 1616 160TH AVE S | 21 | 137 | 48 | PT OF AUD OUTLOT E; BEG. 426' W OF SW COR OF OUTLOT A; W 140'; N 160'; E140' & S 160' TO BEG. | 0.5 | 0.51 | \$ 0.72 |
| 51.900.0040 | BARTHOLOMAW DEBRA | 1634 160TH AVE S | 21 | 137 | 48 | SubdivisionName AUDITORS OUTLOTS TO COMSTOCK Lot 00A SubdivisionCd 51900 | 0.3 | 0.31 | \$ 0.44 |
| 51.900.0050 | BUTENHOFF PEGGY JEAN | PO BOX 102 | 21 | 137 | 48 | SubdivisionName AUDITORS OUTLOTS TO COMSTOCK Lot 00A SubdivisionCd 51900 | 0.2 | 0.22 | \$ 0.31 |
| 51.900.0060 | COMSTOCK CITY OF | PO BOX 39 | 21 | 137 | 48 | SubdivisionName AUDITORS OUTLOTS TO COMSTOCK Lot 00A SubdivisionCd 51900 | 0.1 | 0.14 | \$ 0.20 |
| 51.900.0070 | LOHSE VERNA L | PO BOX 16 | 21 | 137 | 48 | SubdivisionName AUDITORS OUTLOTS TO COMSTOCK Lot 00A SubdivisionCd 51900 | 0.2 | 0.22 | \$ 0.31 |
| 51.900.0080 | O'NEIL KEVIN P & MARY R | 640 BROADWAY | 21 | 137 | 48 | PT OF AUDITOR E TO COMSTOCK BEG 326' W OF SW COR OF OUTLOT A; W 100'; N160'; E100' & S160' TO BEG 21 137 48 COMSTOCK CITY | 0.4 | 0.37 | \$ 0.52 |
| 51.900.0090 | ASKEGAARD ANDREW A | 15862 21ST ST S | 21 | 137 | 48 | THAT PART OF OUTLOT E LYING WITHIN 20 RDS OF N & W BOUNDRY OF PLATTEDVIL LESS .22A. COMSTOCK CITY 21 137 48 | 12.0 | 11.98 | \$ 14.53 |
| 51.900.0095 | C-W VALLEY COOP & C/O CURT BJERTNESS | PO BOX 69 | 21 | 137 | 48 | 110' N & S X 150' E & W IN SE1/4SW1/4 BEG 2397.83' E & 320.47' N OF SW COR; E150', N110', W150' & S110' TO POB 21-137-48 (FORMERLY RR OPERATING PROPERTY) | 0.4 | 0.38 | \$ 0.53 |
| 51.900.0097 | C-W VALLEY COOP & C/O CURT BJERTNESS | PO BOX 69 | 19 | 137 | 48 | PT SE1/4 SW1/4 21.137.48 BEG 2397.83' E OF SW1/4 COR; N320.47', E149.30', S318.24 & W149.32' TO POB & PT NE1/4 NW1/4 BEG 2397.83 E OF NW1/4 COR, S884.03, E150', N511.26', W.70', N375' & W149.32 EX S88' 28-137-48 | 3.8 | 3.85 | \$ 5.40 |
| 51.900.0100 | ASKEGAARD ANDREW EDWIN & THOS S | 2203 VICTORIA ROSE LN S | 21 | 137 | 48 | OUTLOT J, K, L & M LESS .23 A. OF OUTLOT M & 1.88 A. & ROAD COMSTOCK CITY 21 137 48 | 27.3 | 27.32 | \$ 35.39 |
| 51.900.0101 | ASKEGAARD EDWIN D | 2203 VICTORIA ROSE LN S | 21 | 137 | 48 | Section 21 Township 137 Range 048 | 4.1 | 4.12 | \$ 5.78 |
| 51.900.0110 | ASKEGAARD THOMAS & KATHERINE | PO BOX 158 | 21 | 137 | 48 | PART OF OUTLOT O BEG 450' E OF NE COR OF LOT 1 BLK 5-ORIG.- E 180'; S TO N LINE OF BROADWAY; W 180' & N TO BEG. COMSTOCK CITY | 1.2 | 1.24 | \$ 1.74 |
| 51.900.0120 | ASKEGAARD EDWIN D | 2203 VICTORIA ROSE LN S | 21 | 137 | 48 | BEG. AT NW COR. OF LOT 6, BLK. 3, ORIG-N & S 100' BY 100' E & W BEING A PART OF OUTLOT-M 21 137 48 COMSTOCK CITY | 0.2 | 0.23 | \$ 0.32 |
| 51.900.0130 | NELSON LANCE N & MARILYN | 15918 21 ST S | 21 | 137 | 48 | BEG. AT A PT 80' E OF NE COR. OF LOT 1, BL. 5, ORIG. THENCE E 100'; S 140'; W 100' & N 140' COMSTOCK CITY 21 137 48 | 0.3 | 0.32 | \$ 0.45 |
| 51.900.0140 | BRASSE SANDRA J | PO BOX 165 | 21 | 137 | 48 | BEG. AT INTER OF N LINE OF BROADWAY & E LINE OF 2ND ST; N 140' E 100' S 100' & W 100' TO BEG. 21 137 48 COMSTOCK CITY .32AC | 0.3 | 0.32 | \$ 0.45 |
| 51.900.0150 | ASKEGAARD ANDREW & MARION | 15862 21ST ST S | 21 | 137 | 48 | OUTLOT N COMSTOCK CITY 21 137 48 | 1.4 | 1.44 | \$ 2.03 |

Exhibit A - Clay County

| Parcel | Landowner Name | Landowner Address | Section | Township | Range | Legal Description | GIS Acres | Impacted Acres | Total Annual Charges |
|----------------------------|--------------------------------------------------|---------------------|------------|----------|------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------|----------------|----------------------|
| 51.900.0160 | ASKEGAARD THOMAS & KATHERINE | PO BOX 158 | COMSTOCK | MN | 56525 | 28 137 48 OUTLOTS P, Q, R & OUTLOT T LESS TRACTS & ROAD COMSTOCK CITY 28 137 48 | 43.6 | 43.61 | \$ 68.36 |
| 51.900.0170 | SHELLITO SCOTT | PO BOX 35 | COMSTOCK | MN | 56525 | 28 137 48 PART OF OUTLOT T BEG. 400' E OF NE COR. OF OUTLOT S; E 100'; S 185'; W 100' & N. TO BEG. CSTK. CITY 28 137 48 | 0.4 | 0.42 | \$ 0.60 |
| 51.900.0180 | HOYME ROGER & LILA J | 2041 160TH AVE S | COMSTOCK | MN | 56525 | 28 137 48 PART OF OUT T BEG 100' E OF NE COR OF OUTLOT S; E & W 99' BY N & S 185' COMSTOCK CITY | 0.4 | 0.42 | \$ 0.59 |
| 51.900.0190 | PROVINZINO TONY & T HENDERSON | 2059 160TH AVE S | COMSTOCK | MN | 56525 | 28 137 48 PART OF OUT. T BEG. 200' E OF NE COR. OF OUT. S; E 100'; S 185'; W 100' & N 185' TO BEG. COMSTOCK CITY 28 137 48 | 0.4 | 0.42 | \$ 0.60 |
| 51.900.0200 | FINNEGAN THOMAS E & WENDY L | PO BOX 5 | COMSTOCK | MN | 56525 | 28 137 48 BEG. 300' E OF NE CORNER OF OUTLOT S; E 100'; S 185'; W 100' & N TO BEG. COMSTOCK CITY 28 137 48 | 0.4 | 0.42 | \$ 0.60 |
| 51.900.0210 | LEWIS RICHARD T | 2119 160TH AVE S | COMSTOCK | MN | 56525 | 28 137 48 BEG 500' E OF NE COR OF OUT- S 185'; E 120'; N 185' & W 120' TO BEG COMSTOCK CITY 28 137 48. 72AC | 0.5 | 0.51 | \$ 0.72 |
| 51.900.0220 | VANDER VOORT JAMES & RHODA | 2131 160TH AVE S | COMSTOCK | MN | 56525 | 28 137 48 BEG 1754.56' W OF NE COR OF SEC 28; W 120'; S 185'; E 120' & N 185' TO BEG & PT OF OUTLOT T BEG 620' E OF NE COR OUTLOT S, S185', E50', N185' & W50' TO POB COMSTOCK CITY | 0.2 | 0.21 | \$ 0.30 |
| 51.900.0230 | NELSON MICHAEL J | 1754 39TH ST S #101 | FARGO | ND | 58103-7406 | 28 137 48 BEG. AT NW COR OF OUTLOT S; E 125'; S 185'; W150'; N 185' & E25' TO BEG. COMSTOCK CITY 28 137 48 | 0.6 | 0.64 | \$ 0.89 |
| 51.900.0240 | IRISH JENNIFER E | 30411 EAST SHORE DR | PENGILLY | MN | 55775 | 28 137 48 E 50' OF OUTLOT S 28 137 48 COMSTOCK CITY | 0.2 | 0.17 | \$ 0.24 |
| 51.900.0250 | NELSON MICHAEL J | 1754 39TH ST S #101 | FARGO | ND | 58103 | 28 137 48 W 75' OF E 125' OF OUTLOT S COMSTOCK CITY 28 137 48 | 0.3 | 0.26 | \$ 0.36 |
| 51.900.0260 | STANLEY ROBERT J | PO BOX 62 | COMSTOCK | MN | 56525 | 28 137 48 OUTLOT X 28 137 48 COMSTOCK CITY | 0.3 | 0.26 | \$ 0.37 |
| 51.900.0270 | MATTSON CLIFFORD ETAL | 221 OXBOW CIR | OXBOW | ND | 58047-5007 | 28 137 48 THAT PART OF OUTLOT Y BEG. AT NW COR. OF OUTLOT X, THENCE W 62'; S 140'; E 62' & N 140' TO BEG. 28 137 48 COMSTOCK CITY | 0.2 | 0.20 | \$ 0.28 |
| 51.900.0280 | TAASAAS MYRON H | 1711 160TH AVE S | COMSTOCK | MN | 56525 | 28 137 48 PT. OF OUTLOT Y BEG. AT NW COR. OF LOT 1, BLK. 3, ASKEGAARD'S ADD. S& N 140' & E & W 50' CSTK. CITY 28137 48 | 0.2 | 0.16 | \$ 0.23 |
| 51.900.0290 | TORFIN TODD | 2023 160TH AVE S | COMSTOCK | MN | 56525 | 28 137 48 PART OF OUTLOT T, BEG. AT NE COR OF OUTLOT S; E 100'; S 185'; W 100' & N 185' TO BEG. 21 137 48 | 0.4 | 0.42 | \$ 0.60 |
| 51.980.0090 | BURLINGTON NORTHERN & RR CO PROPERTY TAX DEPT | PO BOX 961089 | FORT WORTH | TX | 76161-0089 | 18 137 48 SubdivisionName GENERAL PROPERTY SubdivisionCd 51980 | 11.5 | 11.50 | \$ 16.14 |
| Clay County Total = | | | | | | | | | \$ 28,883.18 |

